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## INSPECTION PROCEDURE 92711

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### CONTINUED IMPLEMENTATION OF STRIKE PLANS DURING AN EXTENDED STRIKE

PROGRAM APPLICABILITY: 2515, 2545, 2600, 2681

#### 92711-01 INSPECTION OBJECTIVES

- a. To evaluate the licensee's long term implementation of the strike contingency plans.
- b. To verify that operations are proceeding in a safe and orderly manner during the strike.

#### 92711-02 INSPECTION REQUIREMENTS

02.01 Verify that facility staffing continues to be consistent with staffing requirements and the licensee's contingency plans and the emergency plan. Verify that the licensee's transition to replacement licensed operators and other workers is conducted safely.

02.02 Determine if procedure changes are consistent with requirements in the regulations, the license, and technical specifications.

02.03 Evaluate the performance of one person from each of the following categories:

- a. Plant management.
- b. Senior reactor operators and reactor operators (at reactor sites), or plant operators (at fuel facilities).
- c. Maintenance.
- d. Health physics.
- e. Other personnel responsible for operational or safety functions, especially non-licensed operators in charge of plant equipment that could initiate transients or would be required to mitigate abnormal conditions, transients, or accidents.

02.04 Determine if problems are being experienced in obtaining local police or medical support or supplies.

02.05 Determine if all plant safety review committees are functioning effectively and are complying with the requirements in the license and technical specifications.

- 02.06 Evaluate the licensee's response to any strike-related event(s) (these are events that are caused by strike-related activities and fall within NRC jurisdiction).
- 02.07 Evaluate the licensee's plans for retraining personnel after the strike ends.

## 92711-03 INSPECTION GUIDANCE

General Guidance. After completing IP 92709, "Licensee Strike Contingency Plans," the resident inspection staff shall perform this inspection procedure for the duration of the strike. Inspection requirements shall be met weekly with the exception of the review of the licensee retraining plan, which shall be performed prior to normal staff return to duty.

### Specific Guidance

03.01 Nuclear power plant licensed operator control room staffing is discussed in 10 CFR 50.54(m). It is recommended during the licensee's transition from licensed operators to replacement licensed operators that 24-hour site coverage be used (i.e., continuous control room observation). When the transition has been completed, an augmented site coverage schedule should then be established to monitor control room activities, plant operations, and shift turnovers. The Senior Resident Inspector should be assigned to oversee the on-site activities and continue with baseline inspections. These actions, however, are left to the discretion of regional management. If the licensee demonstrates the emergency plan implementation prior to, or during the strike, the inspectors shall observe activities in all Emergency Response Facilities. This may require additional regional resources to complete. No specific guidance for fuel facilities other than that contained in the approved license application.

03.02 Review procedure changes made during the strike for those procedures used in selected baseline samples of maintenance, surveillance, and operations activities. Determine their effect on plant safety. Verify that licensee management reviewed and approved these changes.

03.03 Evaluate the ability of personnel to continue to function effectively under existing working conditions. The inspector should look for indications of fatigue that might affect the continued safe operation of the plant. Recognizing that this area is very subjective, the inspector should find clear evidence of an effect on safety before raising this as an issue with plant management.

03.03.a No inspection guidance.

03.03.b The inspector should observe all just-in-time crew training and operations involving significant plant evolutions, such as startup, shutdown, or planned power changes greater than 20%.

03.03.c Monitor the performance of major maintenance activities or surveillance tests. During augmented site coverage, inspectors should increase this activity as necessary. Examine the qualifications of personnel involved, determine if the activity is being conducted using an approved procedure, and if all related operational requirements are being satisfied (limiting conditions for operations, etc.). Refer to the licensee's administrative controls, maintenance procedures, and technical specifications (if applicable) for guidance in determining operational requirements for controlling maintenance activities.

03.03.d While monitoring the selected maintenance or surveillance activity, ensure appropriate health physics controls are followed in accordance with established licensee procedures or regulatory requirements. Also, monitor all condition reports involving failure

of radiation protection controls and inform regional management of any significant performance issues.

03.03.e Continue to monitor plant operations as directed in the Reactor Oversight Process.

03.04 No inspection guidance.

03.05 Review the administrative controls section of the technical specifications, license conditions, or other commitments which establish the composition and frequency of meetings, and the responsibilities of the nuclear safety review committees. Evaluate the effectiveness of nuclear safety review committees by attending meetings or reviewing the meeting minutes.

03.06 Review licensee event reports, plant non-conformance reports, and safeguards incident reports and evaluate the effectiveness of the licensee's corrective actions.

03.07 The licensee may not need to conduct refresher training if the strike lasts for less than 1 month. If it lasts longer than one month, training is appropriate. The licensee should include in this training, at a minimum, changes in plant procedures and system modifications. When the strike has ended, regional management should determine the extent of post-strike observation (observe several operations shift turnovers or continuous control room observation) activities to ensure the returning plant staff adequately understand plant conditions and activities.

Licensed reactor operators must maintain their license in an active status as specified in 10 CFR 55.53, "Conditions of Licenses."

#### 92711-04 RESOURCE ESTIMATE

This inspection procedure requires approximately 30 hours (per week) to complete. If required, an additional inspector should assist the resident inspector staff with baseline inspection activities. Regional specialists should lead (for strikes involving security staff) or assist in the review of contingency plans whenever licensed staff or ERO members are involved to ensure that sufficient staff are available to meet license requirements. If it is anticipated that the strike will be extended, support resources should be identified and, if possible, a site coverage schedule developed.

#### 92711-05 REFERENCES

10 CFR 40.31

10 CFR 50.34

10 CFR 50.47

10 CFR 50.54

10 CFR 50, Appendix E

10 CFR 55.31

10 CFR 55.53

10 CFR 60.160

10 CFR 70.22

10 CFR 73, Appendix C

Technical Specifications

END